

EXHIBIT 140

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Civil Action No. 1:17-cv-02989-AT

DONNA CURLING, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, et al.,

Defendants.

VIDEOTAPED DEPOSITION OF

JANICE W. JOHNSTON, M.D.

DATE: August 23, 2022

TIME: 9:39 a.m. to 11:10 a.m.

LOCATION: Krevolin & Horst, LLC
1201 West Peachtree Street, Northwest
Suite 3250
Atlanta, Georgia 30309

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions

1250 Eye Street, N.W., Suite 350

Washington, D.C. 20005

1 ever been asked to be deposed in this case prior to
2 this deposition.

3 MR. DENTON: Which deposition?

4 MS. PORTER: The deposition that we
5 are currently in.

6 THE WITNESS: This is the first
7 deposition that I have been asked -- that I know of
8 that I have been asked to perform.

9 BY MS. PORTER:

10 Q Thank you.

11 MS. PORTER: Adam, will you please
12 produce Tab 1?

13 (Johnston Deposition Exhibit Number 2
14 marked for identification.)

15 MR. SPARKS: I'm handing the witness
16 and her counsel what's been predesignated as Tab 1.

17 BY MS. PORTER:

18 Q Have you ever seen this report
19 before?

20 A I have not.

21 Q Are you aware that Dr. Halderman, who
22 wrote this report, uncovered numerous serious

1 vulnerabilities in Georgia's current election
2 system, and it's detailed in this one-hundred-page
3 report?

4 MR. DENTON: Object to form.

5 THE WITNESS: I have not seen this
6 form.

7 BY MS. PORTER:

8 Q Do you know who Dr. Halderman is?

9 A I know who Dr. Halderman is.

10 Q Have you heard that Dr. Halderman has
11 discovered numerous serious vulnerabilities in
12 Georgia's election system --

13 MR. DENTON: Object to --

14 BY MS. PORTER:

15 Q -- from any source?

16 MR. DENTON: Object to form.

17 THE WITNESS: Would you restate your
18 question?

19 BY MS. PORTER:

20 Q Yes.

21 Have you heard that Dr. Halderman has
22 discovered serious vulnerabilities in Georgia's

1 CERTIFICATE OF NOTARY PUBLIC

2 I, FELICIA A. NEWLAND, CSR, the officer before whom
3 the foregoing video-taped deposition was taken, do
4 hereby certify that the witness whose testimony
5 appears in the foregoing deposition was duly sworn
6 by me; that the testimony of said witness was taken
7 by me in stenotype and thereafter reduced to
8 typewriting under my direction; that said deposition
9 is a true record of the testimony given by said
10 witness; that I am neither counsel for, related to,
11 nor employed by any of the parties to the action in
12 which this deposition was taken; and, further, that
13 I am not a relative or employee of any counsel or
14 attorney employed by the parties hereto, nor
15 financially or otherwise interested in the outcome
16 of this action.

17
18 

19 _____
20 FELICIA A. NEWLAND, CSR
21 Notary Public

22 My commission expires:

September 15, 2024